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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$85,245.00 IN U.S.
CURRENCY,

Defendant.

2:21-MC-00218-WBS-AC

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Shalom Ifrah (“Ifrah”), by and through their respective counsel, as follows:

1. On or about June 15, 2021, claimant Ifrah filed a claim in the administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately \$85,245.00 in U.S. Currency (hereafter “defendant currency”), which was seized on March 22, 2021.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline was September 13, 2021.

4 4. By Stipulation and Order filed September 14, 2021, the parties stipulated to extend to
5 December 13, 2021, the time in which the United States is required to file a civil complaint for
6 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
7 currency is subject to forfeiture.

8 5. By Stipulation and Order filed December 17, 2021, the parties stipulated to extend to
9 February 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
13 extend to April 12, 2022, the time in which the United States is required to file a civil complaint for
14 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
15 currency is subject to forfeiture

16 7. Accordingly, the parties agree that the deadline by which the United States shall be
17 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
18 alleging that the defendant currency is subject to forfeiture shall be extended to April 12, 2022.

19 Dated: 2/09/2021

PHILLIP A. TALBERT
United States Attorney

21 /s/ Kevin C. Khasigian
22 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

24 Dated: 2/09/2022

25 /s/ Evan J. Davis
SANDRA R. BROWN-BODNER
EVAN J. DAVIS
HOCHMAN SALKIN TOSCHER
PEREZ P.C.
Attorney for Shalom Ifrah

(Authorized via phone)

IT IS SO ORDERED.

Dated: February 9, 2022



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE